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CLIENT/MATTER NUMBER
062530-0250

January 27, 2020

Via ECF

The Honorable Peggy Kuo
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Jamison v. Target Corporation,
Case No. 1:19-cv-00650 (NGG)(PK)

Dear Judge Kuo:

We represent Defendant Target Corporation ("Target") in the above-referenced action, and we are submitting this letter, pursuant to your local rules, requesting an extension of 30 days to serve interrogatories and document requests. The current deadline to serve the discovery requests is January 29, 2020. The new proposed deadline would be February 28, 2020. There have been no previous requests for an adjournment of this deadline. The Plaintiff consents to this extension.

The parties are requesting this extension because Plaintiff has filed a letter requesting a pre-motion conference for leave to make a Motion to Amend the Complaint, including the addition of a second named plaintiff as well as new claims. The parties have conferred and agreed to the filing of an amended complaint, but the operative pleading has not yet been filed.

Once the amended complaint is filed, Target intends to make a motion to dismiss the amended complaint and seek a full stay of discovery.

This extension should not affect any other scheduled dates in this matter. The parties thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ Sara P. Madavo
Sara P. Madavo

cc: Spencer Sheehan
Sheehan & Associates, P.C.
Counsel for Plaintiff (via ECF)

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